

... Policy Area Restructuring ...
Replay, Delay ...

MEMO



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

TO: Montgomery County Planning Board

FROM: Montgomery County Planning Department

SUBJECT: Proposal to Create New Policy Area Boundaries for the
Cities of Rockville and Gaithersburg and Around Metro
Stations for the FY 92 AGP

DATE: April 27, 1990

The Planning Board's Final Draft FY 91 AGP includes a number of recommendations regarding the structure of policy areas (see pages 23 to 25 attached). Although the Board did not want to make major changes in policy area boundaries, the Board recommended that the boundaries be adjusted to reflect the current boundaries of the incorporated cities of Gaithersburg and Rockville.

The Board also indicated that some additional development capacity should be created in areas near Metro stations and that this could be accomplished by creating new, smaller policy areas corresponding to sector plan boundaries. These Metro station policy areas would help the County to stage development near mass transit sooner, provide some additional development capacity for housing and possibly jobs, use more effectively the County's investment in the Metrorail system, and reduce average automobile travel and dependency. Last fall, the Council's T&E Committee felt very strongly that these new policy areas should be created.

To create these new policy areas for the FY 92 AGP, it is imperative that decisions be made soon regarding a number of issues. At the worksession on April 30, staff would like to discuss the following six issues, focusing primarily and coming to closure on issues I and III. Items IV and V can be discussed in more detail at a later date without causing a scheduling problem.

I. If We Carve Out Policy Areas for the Cities of Rockville and Gaithersburg, What Should Be Done with the Leftover Pieces?

In the Planning Board's Final Draft FY 91 AGP, the Board recommended that the boundaries of the Gaithersburg and Rockville policy areas conform to current city boundaries. If new policy

areas are created for these two cities, there will be some leftover pieces which had been part of the Gaithersburg East, Gaithersburg West, and Rockville policy areas. While many of these fragments could easily become part of the neighboring traffic zones and policy areas (Aspen Hill, North Bethesda, and Potomac), there are a number of larger fragments which border Group I areas, areas currently without transportation staging ceilings. Map 1 identifies these fragments. Staff recommends that we deal with these pieces as follows.

1. *The City of Gaithersburg.*

This area encompasses all land within the current incorporated limits of the City of Gaithersburg and the U.S. Bureau of Standards. Currently, this area is part of the Gaithersburg East and West policy areas. Staff recommends that the City be one policy area and not be divided by I-270 into an eastern and western piece.

2. *The R & D Village.*

The R & D Village encompasses the Life Sciences Center, the Washingtonian, the 180-acre Crown Farm, the 150-acre Banks Farm (Johns Hopkins University), the 270-acre Thomas Farm, and Traville. It includes part of traffic zones 281, 282, 258, and 267. This area is currently part of the Gaithersburg West and Rockville policy areas. Staff recommends the creation of a new policy area for this area. This recommendation is consistent with the Final Draft Shady Grove Study Area Master Plan Amendment, now before the Council. The R&D Village policy area will encompass all the properties traversed by transit rights-of-way proposed in the Shady Grove plan.

3. *North Potomac.*

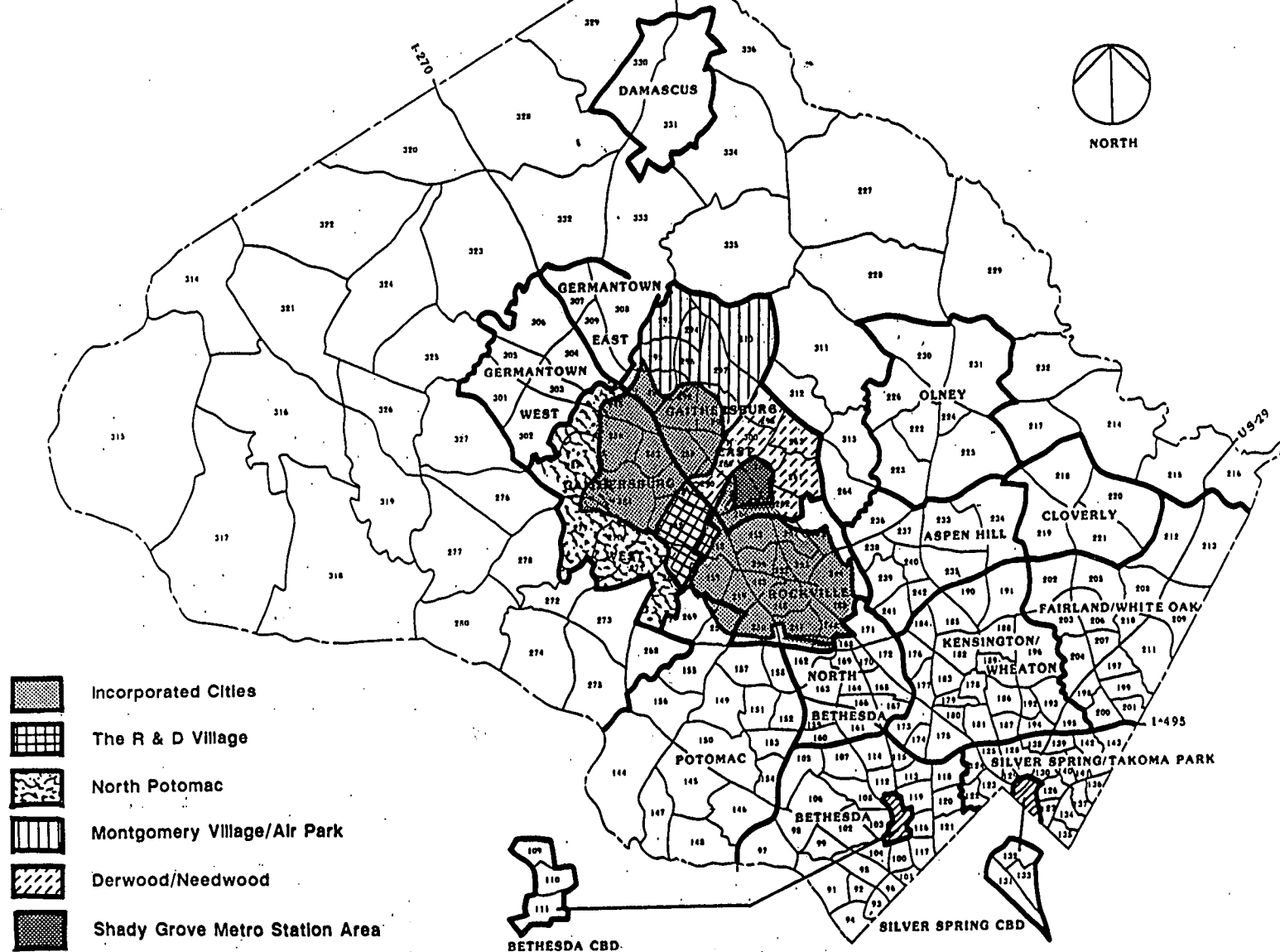
This area encompasses the outer areas of the current Gaithersburg West policy area. It includes parts of traffic zones 285, 286, and 267 and all of traffic zones 270, 271, and 279. Because this area has a higher level of transit service and accessibility and because of the higher development densities permitted, staff recommends that this area be created into a new policy area, rather than incorporated with the Potomac policy area or the Group I Areas where the staging ceiling is set at the zoning ceiling.

4. *Montgomery Village/Airpark.*

This area encompasses the communities of Montgomery Village, Flower Hill, Stewarttown, and Pratherstown and the Montgomery County Airpark. It includes all of traffic zones 293, 294, 295, 296, 297, and 310 and parts of traffic zones 291, 292, and 299. It is bounded on the northwest by Great Seneca State Park and on the southeast by Gaithersburg-Laytonsville Road. The area is currently part of the Gaithersburg East policy area. Staff recommends that this fragment be carved out into a new policy

MAP 1

Proposed New Policy Areas for the Gaithersburg and Rockville Area



area, rather than falling into the Group I area of Goshen and Rock Creek.

5. *Derwood/Needwood.*

This area includes the communities of Derwood, Washington Grove, Emory Grove, and part of Redland and the Needwood Golf Course. It is bounded to the southeast by Rock Creek Regional Park, to the west by the City of Rockville, and to the northwest by the City of Gaithersburg. It includes all of traffic zones 261, 262, 263, 298, and 300 and parts of traffic zones 260 and 289. Currently, this area is part of the Gaithersburg East and Rockville policy areas. Staff recommends that this area be carved out into a new policy area, rather than added to the Group I areas, where there are no staging ceilings.

6. *The City of Rockville.*

This area includes all land located within the current city limits of Rockville. Currently, this area is part of the Rockville policy area, a small part of the Potomac policy area, and a small part of the Gaithersburg East policy area. Staff recommends that the City of Rockville be one policy area.

7. *Fortune Park/Montgomery Mall.*

Staff has three alternatives for this area. One would be to attach Fortune Park and other fragments of traffic zones 250 and 251 to the adjacent Potomac policy area, where the staging ceiling is set at the zoning ceiling. The second would be to expand the North-Bethesda policy area to include the entire area east of Seven Locks Road from the Rockville City limit to Bradley Blvd., encompassing Fortune Park and Montgomery Mall. Community Planning South, however, would prefer no change in the North Bethesda policy area. The third is to leave Fortune Park as part of the City of Rockville, since the City may annex it in the future.

The first option would be the simplest, but would relax growth management controls on parcels with substantial development potential. The second and third approach would include these parcels in areas where there are staging limits. The second approach is consistent with Council's action last fall, expanding the number of intersections subject to Local Area Review in the Potomac policy area.

These recommendations for dealing with all the fragments would result in three additional policy areas. What are now the Gaithersburg East, Gaithersburg West, and Rockville policy areas would be divided into a total of six policy areas (not counting the Shady Grove Metro station area). Accommodating the city boundaries in the AGP would require slight revisions to the boundaries of about 30 traffic zones. Staff expects that staging ceilings for these new areas would be determined in the same manner used today to calculate policy area staging ceilings.

Before this work could be done, however, staff needs to review with the Planning Board what would be the most appropriate Policy Area Group for each of these areas.

II. What Boundaries Should Be Used for Metrorail Station Policy Areas?

In the Planning Board's Final Draft FY 91 AGP, the Board recommended that new policy areas be created for eight Metro station areas including Forest Glen, Friendship Heights, Grosvenor, Nicholson Lane, Shady Grove, Takoma Park, Twinbrook, and Wheaton. In addition, the Board recommended that the Silver Spring and Bethesda CBDs continue to be policy areas. Because Montgomery County already has so many other geographic units for planning (17 policy areas, 20 master plan areas, about 15 sector plan areas, 27 planning areas, 246 traffic zones, and 160 census tracts), the Board recommended that we not create another geographic unit and that we use existing sector plan areas. The total number of policy areas would increase from the current 17 to about 28 with both city and sector plan area changes.

This spring, staff reviewed the sector plan boundaries. Staff believes all these sector plan areas provide a useful boundary for the AGP, with the exception of the Shady Grove sector plan area. This area encompasses about 2,900 acres and is far too large an area to serve as an area within walking distance of the Metro station. For the Shady Grove Metro station area, planning staff recommends that we carve out a smaller area of about 930 acres, including redevelopable land around the Metro station and the 440-acre King Farm.

In reviewing these sector plans with Community Planning, staff also learned that some sector plan area boundaries may shift slightly in the future as sector plan and master plan amendments are prepared. While staff believes AGP boundaries should reflect current sector plan boundaries, staff recommends that AGP boundaries should not necessarily be changed every time the Council adopts a sector plan or master plan amendment. Staff recommends that we review these boundaries periodically for the AGP, and propose changes when appropriate.

III. How Should We Determine the Development Staging Ceilings for the New Metro Station Sector Plan Policy Areas?

Because many of these sector plan areas are so small and contain few roads, staff has less confidence in our ability to reliably estimate the average level of service in these areas. Thus, staff recommends the use of a different approach for determining staging ceilings for these areas. During the past month, planning staff has developed three conceptual approaches for determining sector plan area staging ceilings. It is a complex problem involving a number of competing issues including community planning concerns, legal concerns, transportation analysis techniques, data base needs and limitations, and scheduling problems. These three approaches are described in

increasing order of their complexity and the amount of time needed for implementation.

1. Make a Policy Decision to Allow Approval of a Given Number of Housing Units and a Limited Amount of Retail in Each Sector Plan Area.

Using this simple approach, the County would allow a given number of housing units to receive preliminary plan approval within each sector plan area each year. This would be similar to the AGP's current Special Ceiling Allocation for Affordable Housing, but would allow market rate units to receive approval in areas within walking distance of Metrorail stations.

With this approach, the County would be concerned more with the policy to provide additional housing opportunities near Metro stations than with trying to restrain the growth in congestion and maintain a given average level of service standard in the surrounding policy area. While staff would count housing units approved under this proposal in measuring the average level of service for the larger surrounding policy areas, the staging ceilings in the surrounding policy areas would not be reduced to compensate for the increased development in the sector plan area. With this approach, it would be possible to have more traffic congestion in the surrounding policy areas than would currently be permitted under the adopted average level of service standards. The location of housing in proximity to Metro and employment locations, however, would be expected to change some travel behavior and lessen the net effect on congestion.

Although staff believes it would be possible to use this approach for housing in sector plan areas, staff recommends that it not be used for jobs, other than to allow limited local retail or mixed use opportunities which are associated with residential development. Staff does not believe the need for additional employment development is now sufficient to allow congestion to exceed both the amount associated with the adopted transportation level of service standard for the current policy areas and the amount allowed by the staging limits in some of the approved sector plans.

Although staff has not yet determined an appropriate number of permitted housing units, staff has identified a range from a low of about 250 to 300 per sector plan area to a high of about 2,000 per sector plan area. The smaller number would be sufficient to allow the approval of at least one average sized multi-family housing project per sector plan area. The larger number would be sufficient to bring the County's job-housing ratio of the base plus the pipeline plus net remaining staging ceiling capacity to about 1.52. This would move the County toward a better balance of jobs and housing in which the number of employed residents per household roughly equals the number of jobs per household. Currently, Montgomery County has about 1.5 employed residents per household.

Rationale: Allowing more housing projects to be approved near Metrorail stations would help to achieve several housing goals in the Montgomery County General Plan (1970) as listed in the Recommended FY 91 AGP. These goals include:

- * Providing for the development of new housing within reasonable distance of workplaces, recreation, shopping, community facilities, and mass transportation.
- * Encouraging the location of housing of various densities, types, and costs in proximity to most places of employment.
- * Achieving a balanced relationship between residential growth and employment opportunities within the County.

This approach is consistent with the Council's directive in the FY 91 AGP "to provide more adequate housing capacity under staging ceilings." It is also consistent with Councilmember Hanna's proposal to relax AGP standards for productivity housing.

Technical Feasibility: Because this approach does not require any changes to traffic zone boundaries for sector plan areas, this sector plan concept could be implemented as part of the FY 92 AGP or even as part of the FY 91 AGP. This is the simplest of three approaches and requires no changes to the current TRAVEL model and data bases.

Staffing: This would require little, if any, additional Research and Transportation staff time. Community Planning North, however, may need to prepare a Shady Grove Sector Plan amendment establishing new sector plan boundaries for this area. This would be needed by June 1991, at the latest.

Consistency: The Legal Department stresses that, irrespective of the alternative ultimately selected, a consistent approach must be used in calculating and measuring the effect of staging ceilings on congestion and that exceptions to staging ceilings and different groupings be derived by a clearly articulated, supportable policy rationale uniformly applied to similar properties.

This approach insures consistency among sector plan areas. It could, however, be seen as not being fully consistent with the way staging ceilings are determined for other policy areas because these sector plan ceilings would rely only on judgment and would not account for estimates of future traffic congestion. The amount of housing development allowed under this approach also may not be consistent with the staging limits of several adopted sector plans (e.g., Friendship Heights, Bethesda CBD, and Silver Spring CBD). It may allow more congestion than envisioned in some of the adopted sector plans and master plans, unless the AGP is allowed to continue using development staging limitations

in master plans or sector plans where they are more restrictive. Staff recommends that for now we continue to use the sector plan staging limits for those areas where they are more restrictive.

2. Modify Existing Traffic Zone Structure to Represent Sector Plan Areas and Set Transportation Staging Ceilings for Jobs and Housing Using the TRAVEL Model to Measure the Impact on Surrounding Policy Areas.

Using this approach, staff would have to modify the existing traffic zone system to represent the sector plan areas and revise data bases, the TRAVEL model, and congestion measurement systems. Using the model, staff would test alternative housing and jobs staging ceilings in the sector plan areas to determine their effect on the average level of service standard for the surrounding policy areas. Most likely staff would start with a number somewhat less than the zoning ceiling for the sector plan area and run the model to see what the average level of service would be for the adjacent policy areas. If the level of service was more congested than the adopted standard, staff would reduce the number used for the staging ceiling and run the model again. This iterative process would continue until an acceptable transportation level of service was attained for the surrounding policy areas. In areas where the sector plan provides a staging limit, staff would use this number as the staging ceiling. This is very similar to the method now used to set staging ceilings in other policy areas.

Because this approach would be more accurate than the first approach in terms of geography and in measuring development's effect on the average level of service and the amount of congestion, staff would feel more comfortable using it for setting the staging ceiling for both housing and jobs. Because smaller geographic areas are carved out around Metro stations, this approach will help the TRAVEL model be more sensitive to the proximity of development to mass transit and would possibly allow more development than is allowed under our current policy areas.

Rationale: Allowing more housing and jobs to be approved near Metro stations would help to achieve several housing and economic goals of the Montgomery County General Plan (1970) as listed in the Recommended FY 91 AGP (pages 11 and 12). These include the goals listed for the first approach as well as:

- * Encouraging the development of employment opportunities to provide for growth in economic opportunity, to expand our tax base, and to increase career opportunities within the County's borders.
- * Ensuring that employment areas are provided with adequate access to a variety of modes of transportation.
- * Revitalizing and encouraging the development and redevelopment of the central business districts.

This approach follows through on the Council's directive in the FY 90 AGP to "do a comprehensive review of the structure of policy areas" and "to provide more adequate housing capacity under staging ceilings." As shown in the Comprehensive Growth Policy Study, clustering housing and jobs near mass transit reduces the total number of vehicle miles traveled, compared to alternative scenarios in which the same amount of development is not as clustered.

Technical Feasibility: With this approach, staff would have to modify the existing traffic zone structure, and consequently, the data bases, the TRAVEL model, and the system for measuring congestion. Staff estimates that the creation of sector plan areas would shift slightly the boundaries of approximately 25 traffic zones and that the number of traffic zones in Montgomery County would increase by no more than 10 from 246 to, at the most, 256 zones. Staff believes it would be possible to make these adjustments in time for the October staff draft FY 92 AGP, if the Board soon comes to closure on how to proceed. Staff has already begun work on modifying traffic zone boundaries for the cities and a number of sector plan areas.

Staffing: This will involve additional staff time from the Research, Transportation, and Community Planning Divisions. Some of this work should also be useful to the Community Planning Divisions in their future work on sector plan amendments since data for these sector plan areas would readily be available. Community Planning may need to prepare an amendment to the Shady Grove Sector Plan, providing a new boundary, an item not in the current work program.

Consistency: This would be consistent with the current approach used to set transportation staging ceilings for the AGP. It would also provide a consistent methodology for setting ceilings for each sector plan area, something which the Legal Department recommends. Similar to the first approach, the staging ceilings may be seen as not being fully consistent with the staging limits of adopted sector plans, unless the AGP continued to allow the use of development staging limitations in master plans or sector plans where they are more restrictive than APF guidelines.

3. Modify Existing Traffic Zone Structure to Account for Sector Plan Areas and Rely on Future Sector Plan Amendments to Set Transportation Staging Ceilings for Jobs and Housing for the AGP.

With this approach, the Council would create sector plan areas as policy areas for the FY 92 AGP, but would not set a staging ceiling for each area, unless the adopted sector plan already has a staging element. Staging ceilings for these areas would be established and adjusted incrementally as part of a comprehensive master plan or sector plan amendment for these areas.

This approach would offer a more detailed, thorough, and perhaps accurate analysis of transportation facilities for these

areas and would rely on a lot of hand analysis. Most likely, the method used to analyze the adequacy of transportation facilities would resemble the method used for the Wheaton CBD Sector Plan Amendment or for the Silver Spring CBD Sector Plan Amendment. The work underway for North Bethesda, and about to begin for Bethesda CBD and Friendship Heights, could include determining staging ceilings.

One of the disadvantages of this approach is that the staging ceilings would not be responsive to changes in capital programming, development patterns, and to transportation technologies. Generally, the life of a master plan or sector plan has been ten years. Thus, the staging ceiling for these sector plan areas would not change over a long period, unless a sector plan was amended. The Shady Grove Sector Plan is an example of a sector plan which had to be amended two times in four years to modify its staging limitations.

Rationale: This approach has the same rationale as the second approach.

Technical Feasibility: This would involve a lot of hand analysis and detailed staff work similar to what is done for a cordon analysis. Because this work could not be done outside the framework of a master plan or sector plan amendment, it would take several years before all sector plan areas would have staging ceilings. At this time, the Planning Board is not scheduled to review sector plan areas such as Forest Glen and Takoma Park. This presents a problem since the Council has asked for a policy area restructuring for several years. Currently, the Bethesda CBD-Sector Plan, the Friendship Heights Sector Plan, and the Silver Spring CBD Sector Plan have development staging limits. The Final Draft Wheaton CBD Sector Plan Amendment also has a number which we could use (the zoning ceiling), but Council has not yet adopted this amendment.

Staffing: This would require extensive Transportation, Research, and Community Planning staff time. If staging ceilings need to be modified more than once every ten years, significant Community Planning time could be required to prepare sector plan amendments.

As part of the forthcoming work on the North Bethesda Master Plan, it may be possible to develop appropriate staging ceilings. Due to the scheduled work program, however, the Council could not be expected to act on the North Bethesda sector plan area staging ceilings until after the FY 92 AGP is adopted. Work is also beginning on two other key sector plans, Bethesda CBD and Friendship Heights. Similarly, the Council will not be acting on these until after the FY 92 AGP is adopted.

Consistency: This approach could result in using different techniques to analyze transportation facilities in the various sector plan areas. Adopted sector plan staging limits have relied on somewhat different methodologies as techniques for

analysis have been refined or tailored to different situations. Because sector plans are amended incrementally and sometimes with the assistance of consultants, care would need to be taken to ensure that consistent methods are used or that varying approaches respond to defined, important policy objectives. This is needed to protect the AGP from a legal challenge. On the other hand, the AGP staging limits for these areas would be consistent with sector plan staging limits.

IV. What Should Be Done With Local Area Review Standards for Metro Station Policy Areas?

The AGP uses two tests to determine if public transportation facilities are adequate. The first is policy area review, which looks at policy area average level of service standards. The second is local area review (LAR), which looks at the critical lane volume of nearby intersections. Even if the Council increases the policy area staging ceiling in these Metro station areas, a number of areas have local area review problems, if the current LAR standards are used.

If some additional development capacity is to be provided in these sector plan areas in the short term, more flexible local area review requirements may be needed. For example, the level of service standard (LOS) for LAR could be lowered from the current mid-point of LOS E (critical lane volume of 1,525) for Groups II to V areas to the worst point of LOS E (critical lane volume of 1,600) or perhaps to some point within LOS F. Another possibility is to use the Silver Spring CBD approach requiring a queuing analysis for any intersection with a critical lane volume of 1,600. At another worksession with the Planning Board, staff would like to discuss more fully this issue and Item V below.

V. What Additional Requirements May Be Needed in the Sector Plan Policy Areas?

If additional development is staged sooner near Metro stations, it makes sense to require developers to mitigate trips and to encourage changes in commuting patterns so we are less dependent on the automobile. It should be easier to walk, bike, or take mass transportation to work in these Metro station areas. Allowing additional development in the near term is a strong incentive to encourage the private sector to change travel behavior patterns. Using the Silver Spring CBD as an example, we could have a number of requirements such as:

- a. Traffic Management Districts
- b. Sidewalk Districts
- c. Traffic Mitigation Programs
- d. Automobile Parking Constraints and required Provision of Bicycle Parking
- e. Mode Share Goals
- f. Increased Financing of Pedestrian and Bicycle Improvements or
- g. Site Plan Review.

VI. Future Studies Relating to Transit-Based Policy Areas

Many of the current sector plans relate to Metrorail. In the future, however, light rail systems may be implemented. In the Shady Grove Study Area, for example, these separate transit rights-of-way are already proposed. Additional study is needed in terms of whether special transportation staging ceilings should be created for areas within a certain distance of transit stops along a light rail. These areas should relate to walking distances from stations, where clustered land use would tend to generate the fewest number of auto trips per unit of development.

COMPARISON OF ALTERNATIVE METHODS FOR SETTING SECTOR PLAN STAGING CEILINGS

4/30/90

<u>METHOD</u>	<u>ADVANTAGES</u>	<u>DISADVANTAGES</u>
III 1. Policy Decision Approach	<ul style="list-style-type: none"> -Simplest method (little or no additional staff time) -Could be incorporated into AGP this year -Could provide significant additional housing capacity -Ceilings could be amended easily 	<ul style="list-style-type: none"> -Might result in unacceptable levels of congestion within the area and/or adjacent policy areas -Only increases housing ceiling, not jobs (staff view) -Not consistent with way ceilings are determined for other policy areas -May not be consistent with sector plan recommendations which could limit applicability
III 2. AGP Areawide Approach	<ul style="list-style-type: none"> -Could be used for both housing and jobs -Consistent with approach for setting ceilings for other policy areas -Would protect adjacent policy areas (maintain acceptable level of service) -Could be incorporated into AGP this year (probably) -Ceilings could be amended easily 	<ul style="list-style-type: none"> -More work for staff -Limit to amount of housing capacity created -May not be consistent with sector plan recommendations which could limit applicability
III 3. Sector Plan Approach	<ul style="list-style-type: none"> -Could be used for both housing and jobs -Would protect adjacent policy areas (maintain acceptable level of service) -AGP ceilings would be consistent with sector plan recommendations based on detailed analysis 	<ul style="list-style-type: none"> -Most work for staff -Could not be totally incorporated into AGP for several years -Limit to amount of housing capacity created -Might be difficult to maintain consistency between policy areas -AGP ceilings could not be changed without sector plan amendment

The County Council, in adopting the FY 90 AGP, asked the Planning Board and the Executive to collect data and analyze a number of issues for the FY 91 AGP. This section of the Annual Growth Policy report provides a discussion of this work to date.

1. COMPREHENSIVE REVIEW OF THE STRUCTURE OF POLICY AREAS

A. Background

The County Council requested that the Planning Department staff conduct a comprehensive review of the structure of the policy areas and policy area boundaries used for the Annual Growth Policy (AGP). During the past year, the Planning Department has discussed possible restructuring concepts with the Transportation Model Technical Advisory Committee. The Council assigned to its Transportation and Environment (T&E) Committee a review of related issues including criteria, technical feasibility, timing, and agency work programs and asked the Committee to report back to them prior to December 1, 1989. The T&E Committee discussed this issue at great length with the Planning Board and the staff of the Executive on November 21, 1989.

B. Criteria for Structuring Policy Areas

The Planning Board has identified a number of criteria which should be used if the Council decides to restructure policy areas and change policy area boundaries. These criteria include:

1) Conform to Current Policy Area Boundaries. To minimize disruption, policy area boundaries should conform to current policy area boundaries, except where other more pressing criteria may suggest the need for a change.

2) Keep the Structure as Simple as Possible. Currently, the County has 17 policy areas, 27 planning areas, 20 master plan areas, about 15 sector plan areas, and 246 traffic zones. The Planning Board recommends against creating still another level of geography for the Annual Growth Policy. The Council should try to make any new policy area boundaries conform to these already existing boundaries when possible.

3) Conform to City Boundaries. Currently the boundaries of the incorporated cities of Rockville and Gaithersburg do not conform to the Rockville and Gaithersburg policy areas. The Planning Board recommends that the Council make these policy area boundaries correspond since the County has no control over development approvals in these cities.

4) Make policy areas more sensitive to the presence of transit. Although the Board at this time does not have a specific recommendation on how to accomplish this, we recommend that the Council consider making some adjustments to the ceilings in

areas close to Metrorail stations to provide some additional development capacity, particularly for residential or multi-use projects in areas where there is zoning capacity. One approach which the Board offers for discussion is the creation of new, smaller policy areas around Metrorail stations using already existing sector plan area boundaries. Most of these sector plan areas were defined as the area within walking distance of the Metrorail station. This would extend some of the concepts used in creating the Bethesda CBD and the Silver Spring CBD policy areas to other sector plan areas which contain Metrorail stations. This approach would result in the creation of 9 new policy areas as listed below:

- * Forest Glen
- * Friendship Heights
- * Glenmont
- * Grosvenor
- * Nicholson Lane
- * Shady Grove
- * Takoma Park
- * Twinbrook
- * Wheaton

If these sector plan areas become new policy areas, the Council would need to set transportation staging ceilings for these areas. While the Planning Board has not yet had time to fully discuss how this would be done, there are several possible approaches including setting the ceiling at the zoning ceiling, or at some proportion of the zoning ceiling; setting the ceiling using historical development trends; or setting the ceiling to provide for a specific number of years of forecasted employment and housing growth. The Planning Board and its staff plan to discuss this matter more fully in 1990. Regardless of the approach, the staging ceiling should not be set at a level higher than the zoning ceiling.

As part of this type of restructuring, the Planning Board would recommend that the Council consider requiring traffic mitigation programs, transportation management districts, and/or minimal non-auto driver mode share goals for development in these transit station locations, even if the sector plan does not require transportation management organizations. Such requirements could be included in revised guidelines and criteria for setting level of service standards. The Council may also want to consider reevaluating the current practice of using the same intersection level of service standards for local area review in these transit station locations.

At this time, the Planning Board does not recommend a comprehensive restructuring of policy area boundaries for the FY 91 AGP. The Board believes that any restructuring concept needs a great deal of study and public discussion before it can become a part of the growth management process. The Board recommends that the Council not consider making these types of changes until the FY 92 AGP.

C. Technical Feasibility Issues

1) Zone Structure. To implement these recommended changes at the sector plan area level and in the Rockville and Gaithersburg policy area boundaries, the Planning Department would need to redefine the traffic zone system in these areas. The current traffic zone system, which is more than 15 years old, does not conform to sector plan areas or current city boundaries. The Planning Department would need to coordinate any changes with the Council of Governments.

2) Modify the County's Data Bases. If traffic zone boundaries are modified, the Planning Department would also need to use its computer mapping system to modify its data bases and the development pipeline to reflect this new traffic zone geography.

3) Queue of Pending Preliminary Plans. New policy area boundaries could have an impact on the relative positions of pending preliminary plans in the queue. When the Council created the Aspen Hill policy area out of the Kensington/Wheaton/Aspen Hill policy area, a 6 month grandfather period was provided for all projects in the queue. This may not work as well with this type of restructuring since the queue of completed preliminary plan applications in some areas is very long. Readers should refer to the Planning Department's listing of pending preliminary plans.

D. Timing of a Restructuring and Agency Work Programs

The Planning Board recommends that the Council not consider making these changes until the FY 92 AGP. Because of the required changes in traffic zone boundaries, it will not be possible to carve out sector plan areas and modify the Rockville and Gaithersburg policy area boundaries in time for the adoption of the FY 91 AGP in June, 1990. In preparing the Planning Department's proposed FY 91 budget, the Board is now reviewing the budget impact, if any, required to accomplish these type of changes for the FY 92 AGP.

2. **AMENDMENT TO FY 90 ANNUAL GROWTH POLICY ON SPECIAL CEILING ALLOCATIONS**

During its deliberations on the FY 90 AGP, Councilmember Subin proposed an amendment to the growth policy which would provide a limited exception to policy area review requirements to ensure that the County has reasonably accessible health care and advanced educational opportunities. The Planning Board was asked to expeditiously prepare an amendment that would: "1) establish additional special ceiling allocations for private health care facilities and post-secondary educational facilities." In analyzing this amendment, Planning staff looked at the market for medical office space, special exceptions for medical or dental clinics, post-secondary educational institutions in Montgomery County, and sewer capacity allocation policies used during the